

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	
	§	
KAPS CONSTRUCTION, LLC.	§	CASE NO. 24-51399
	§	
	§	
DEBTOR	§	CHAPTER 11
<hr style="border: 0.5px solid black;"/>		
ABELARDO “Abel” HERNANDEZ,	§	
Individually and Derivatively on Behalf	§	
Of KAPS CONSTRUCTION, LLC AND	§	
K-LEX MANUFACTURING, INC.	§	ADVERSARY
<i>Plaintiffs,</i>	§	PROCEEDING
	§	NO. 24-05049-CAG
	§	
v.	§	
	§	
LIONANDO “Larry” POLANCO	§	
<i>Defendant.</i>	§	

DEFENDANT’S STATEMENT REGARDING CONSENT

TO THE HONORABLE CRAIG A. GARGOTTA, CHIEF UNITED STATES
BANKRUPTCY JUDGE:

Now comes Lionando “Larry” Polanco and pursuant to the Court’s Order, files
this Statement Regarding Consent and would show the Court as follows:

1. Defendant consents to the entry of final orders and a final judgment by the Court
(an Article I bankruptcy judge) in this adversary proceeding.

WHEREFORE, PREMISES CONSIDERED, Lionando “Larry”
Polanco requests that this Court take notice of his Statement Regarding Consent and
grant such other relief to which Defendant may be entitled.

Respectfully submitted,

LAW OFFICE OF DENNIS K. DRAKE
2929 Mossrock, Suite 204
San Antonio, Texas 78230
Telephone: (210) 366-9636
Telecopier: (210) 366-2532
E-Mail: ddrake@dkdrakelaw.com

By: /s/ Dennis K. Drake
DENNIS K. DRAKE
State Bar No. 06105000
ATTORNEY FOR DEFENDANT,
LIONANDO "LARRY" POLANCO

CERTIFICATE OF SERVICE

I certify that a true copy of the foregoing document or notice (identified below) to which this certificate is attached was served by either electronic filing, e-mail, certified mail return receipt requested, facsimile, and/or hand delivered on the same date noted below to each listed party at his/her/their respective address as follows:

DOCUMENT /NOTICE

DEFENDANT'S STATEMENT REGARDING CONSENT

PARTY OR ATTORNEY OF RECORD

METHOD OF SERVICE

DAVIS & SANTOS, PLLC

Santos Vargas

E-mail: svargas@dslawpc.com
filing

Electronic

Joshua J. Caldwell

E-mail: jcaldwell@dslawpc.com
filing

Electronic

Landon M. Hankins

E-mail lhankins@dslawpc.com
filing

Electronic

Rachel Garza

E-mail: rgarza@dalawpc.com
filing

Electronic

719 S. Flores Street

San Antonio, Texas 78204

Telephone: (210) 853-5882

Facsimile: (210) 200-8395

Attorneys for Plaintiffs

Morris E. “Trey” White III
VILLA & WHITE, LLP
400 N.E. Loop 410, Suite 615
San Antonio, Texas 78216
E-mail: treywhite@villawhite.com
filing

Electronic

Attorneys for KAPS Construction, LLC

Eric Terry
ERIC TERRY LAW, PLLC
3511 Broadway
San Antonio, Texas 78209
E-mail: eric@ericterrylaw.com
filing

Electronic

Subchapter V Trustee

James Rose
OFFICE OF THE US TRUSTEE
615 E. Houston St., Ste 533
San Antonio, Texas 78205
E-mail: James.Rose@usdoj.gov
filing

Electronic

US Trustee

October 15, 2024

/s/ **Dennis K. Drake**
Dennis K. Drake